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October 2, 2023

VIA ECF

Magistrate Judge James M. Wicks
Eastern District of New York
United States Courthouse
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Naiman v. Big Think*
Case No. 22 cv 02531

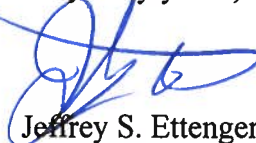
Dear Judge Wicks:

Please be advised that our office represents the Defendant regarding the above-noted matter. The parties are mutually seeking a brief extension of discovery. Further to the recent Court order, Defendant is undergoing a search for appropriate records consistent with the Court directive. Moreover, the parties each served post deposition supplemental demands, and each have agreed to extend the time to serve responses. All of this discovery should be completed by October 23, 2023. Thereafter, Plaintiff will be providing this data to their expert for analysis, which should also take 2-4 weeks to review. We anticipate completing discovery by Thanksgiving.

Lastly, the parties have had settlement discussions and we are looking to mediate the case in early November.

Based on the foregoing, we mutually ask the Court to extend completion of discovery until November 30, 2023.

Very truly yours,



Jeffrey S. Ettenger